

The Honorable Robert S. Lasnik

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
STATE, et al.,

Defendants.

NO. 2:18-cv-01115-RSL

STIPULATION TO EXTEND
DEADLINE TO FILE DISCOVERY-
RELATED MOTIONS

NOTING DATE: NOVEMBER 6, 2018

Pursuant to Local Rules 7(d)(1) and 10(g), the Plaintiff States and the Private Defendants¹ hereby file this stipulated request to extend the deadline to file motions related to discovery disputes until 21 days after the Court rules on the Private Defendants' pending Motion for Judgment on the Pleadings. The grounds for this stipulation are as follows:

1. The current deadline to file motions related to discovery disputes is November 15, 2018. Dkt. # 115 (Case Management Order), p. 2.

2. On September 20, 2018, the Plaintiff States propounded a set of discovery requests on the Private Defendants.

3. On October 11, 2018, the Private Defendants filed a Motion for Judgment on the

¹ The Private Defendants are Defense Distributed, the Second Amendment Foundation, and Conn Williamson. The Federal Defendants do not oppose the relief requested in this stipulation.

1 Pleadings, seeking an order “dismissing them from this action.” Dkt. # 114. As of the filing of
 2 this stipulation, the motion has been fully briefed but has not been ruled upon.

3 4. On October 22, 2018, the Private Defendants responded to the Plaintiff States’
 4 discovery requests, objecting on the grounds *inter alia* that their Motion for Judgment on the
 5 Pleadings was pending, and that they would not be subject to party discovery if the motion were
 6 granted.

7 5. The Plaintiff States and the Private Defendants agree that, if the Motion for
 8 Judgment on the Pleadings were to be granted in full, the Private Defendants would not be subject
 9 to party discovery. They further agree that postponing their efforts to resolve any discovery
 10 disputes until after the Court has ruled on the motion will conserve the parties’ resources and
 11 avoid any need to seek provisional relief in keeping with the current deadline without the benefit
 12 of a ruling on the motion.

13 Based on the above, the Plaintiff States and the Private Defendants jointly request that
 14 the Court extend the deadline to file discovery-related motions to 21 days after the Court issues
 15 a ruling on the Motion for Judgment on the Pleadings.

16 DATED this 6th day of November, 2018.

17
 18 ROBERT W. FERGUSON
 Attorney General

19 /s/ Jeffrey Rupert
 20 JEFFREY RUPERT, WSBA #45037
 Division Chief
 KRISTIN BENESKI, WSBA #45478
 Assistant Attorney General
 TODD BOWERS, WSBA #25274
 Deputy Attorney General
 JEFF SPRUNG, WSBA #23607
 Assistant Attorney General
 ZACH JONES, WSBA #44557
 Assistant Attorney General
 24

JeffreyR2@atg.wa.gov
KristinB1@atg.wa.gov
ToddB@atg.wa.gov
JeffS2@atg.wa.gov
ZachJ@atg.wa.gov
Counsel for the Plaintiff States

IMMIX LAW GROUP PC
/s/ Joel B. Ard
Joel B. Ard, WSBA #40104
Immix Law Group PC
701 5th Ave Suite 4710
Seattle, WA 98104
Phone: (206) 492-7531
Fax: (503) 802-5351
joel.ard@immixlaw.com
Counsel for the Private Defendants

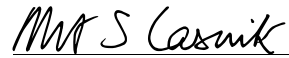
FARHANG & MEDCOFF
/s/ Matthew Goldstein
Matthew Goldstein*
Farhang & Medcoff
4801 E. Broadway Blvd., Suite 311
Tucson, AZ 85711
Phone: (202) 550-0040
mgoldstein@fmlaw.law
*Admitted pro hac vice
Counsel for the Private Defendants

BECK REDDEN LLP
/s/ Charles Flores
Charles Flores*
Beck Redden LLP
1221 McKinney Street, Suite 4500
Houston, TX 77010
Phone: (713) 951-3700
cflores@beckredden.com
*Admitted pro hac vice
Counsel for Defendant Defense Distributed

ORDER APPROVING STIPULATION

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: November 7, 2018



Honorable Robert S. Lasnik
United States District Judge